

# CBER Update: Advertising and Promotional Labeling Branch (APLB)

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Office of Compliance and Biologics Quality

DIA Annual Meeting  
June 14, 2004



## Agenda

- Overview of APLB
- Review Enforcement Actions and Examples
- DTC Guidance Documents
- APLB Priorities



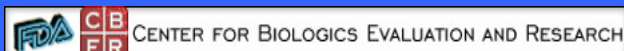
# CBER Organization

## CENTER FOR BIOLOGICS EVALUATION AND RESEARCH

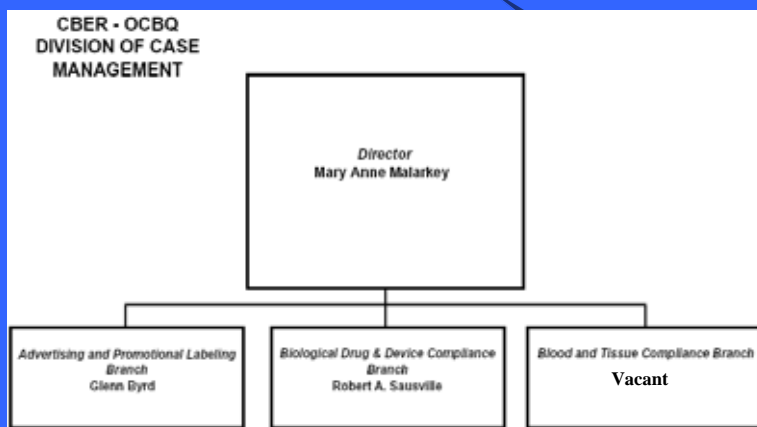


# CBER/APLB Organization

## CBER OFFICE OF COMPLIANCE AND BIOLOGICS QUALITY



## CBER/APLB Organization



## APLB Staff

- Glenn Byrd, MBA, RAC - Chief
- Nancy Chamberlin, Pharm.D.
- Maryann Gallagher
- Yongkai Weng, Ph.D.
- Bob Stevenson, on 60-day detail



## Current Work in APLB

### Routine Activities – same as DDMAC:

- Launch and accelerated approval materials
- Advisory and surveillance review of direct-to-consumer broadcast and print ads
- Monitor promotional surveillance materials and internet sites
- Review and act on complaints



## Current Work in APLB

### Unique to CBER:

- Proprietary name reviews as consults to each product office (OBRR, OVRR, OCTGT)
- Blood donor incentives - proposed programs and complaints



## APLB Enforcement FY-04


- Untitled Letters – five (5) issued
  - ❑ A *Haemophilus b* and Hepatitis B Vaccine – **Comvax, Merck.**
  - ❑ A vaccine product for treatment and prophylaxis of carcinoma in situ (CIS) of the urinary bladder – **TheraCys, Aventis Pasteur.**
  - ❑ A blood product for control and prevention of hemorrhagic episodes and surgical prophylaxis in patients with hemophilia A – **ReFacto, Wyeth.**
  - ❑ Vaccine products for treatment of suspected exposure to rabies (Imogam) or for possible rabies exposure and pre-and post-exposure treatment of rabies – **Imogam/Imovax, Aventis Pasteur.**
  - ❑ A vaccine for the active immunization against typhoid fever – **Typhim Vi, Aventis Pasteur.**




## APLB Enforcement FY-04

- Warning Letters – three (3) issued
  - ❑ A blood product for treatment of primary immunodeficiency diseases, B-cell chronic lymphocytic leukemia, idiopathic thrombocytopenic purpura, and Kawasaki Syndrome – **Polygam S/D, Baxter Healthcare.**
  - ❑ A blood product for treatment of classical hemophilia – **Advate, Baxter Healthcare.**
  - ❑ A fibrin sealant indicated as an adjunct to hemostasis in patients undergoing liver surgery – **Crosseal, Omrix biopharmaceuticals.**
- All CBER Enforcement letters are posted at:  
[www.fda.gov/cber/efoi/adpromo.htm](http://www.fda.gov/cber/efoi/adpromo.htm)






Aventis Pasteur





### Rabies is on the Prowl...

• For those with high-risk jobs  
 • For those in high-risk areas  
 • For those exposed to potentially rabid animals  
 • If bitten or scratched, rabies is almost always fatal

Aventis Pasteur


### Compare the typhoid vaccine options, then choose<sup>1</sup>



**TYPHIM VI<sup>®</sup>**  
 Typhoid Vi  
 Polysaccharide Vaccine

Clinical studies of Ty21a revealed a non-compliance rate with 1 or more instructions in as many as 18% to 30% of travelers.<sup>2,4</sup>

**One Shot Equals Full Compliance**


	TYPHIM VI <sup>®</sup> (polysaccharide vaccine)	Ty21a <sup>2</sup>
<b>Description</b>	Purified capsular polysaccharide	Attenuated S typhi
<b>Dosing schedule</b>	1	4, in capsules, days 0, 2, 4, 6
<b>Route of administration</b>	Intramuscular	Oral, enteric-coated capsules
<b>Age at administration, yr</b>	≥2	≥6
<b>Adverse reactions</b>	Fever or mild local reactions, <10%	Mild, transient gastrointestinal tract reactions, <1%
<b>Efficacy trials</b>	55% in South African children, 74% in Nepalese children and adults	33%–67% with enteric-coated capsules <sup>2</sup>
<b>Booster, yr</b>	2, good anamnestic response	5, but no data on responses
<b>Compliance issues</b>	None	All doses need refrigeration; must take before meals; 18%–30% compliance errors <sup>3,4</sup>
<b>Contraindications</b>	Past reactions to Vi vaccine	Immunocompromised, concomitant arthritis, plasmids, antibiotics or oral polio vaccine, gastrointestinal tract disease <sup>2</sup>

Adapted from Plotkin SA and Bouveresse-Cam N. Arch Intern Med. 1995;155:2298.  
 To order TYPHIM VI<sup>®</sup>, visit us on-line at [www.vaccineshoppe.com](http://www.vaccineshoppe.com) or call 1-800-VACCINE (1-800-822-2463).


**Safety Information**  
 Common adverse reactions to TYPHIM VI<sup>®</sup> are tenderness and pain at the injection site, malaise, and headache. TYPHIM VI<sup>®</sup> is contraindicated in patients with a history of hypersensitivity to any component of this vaccine. Acute infection or febrile illness may be reason for delaying use of TYPHIM VI<sup>®</sup> except when, in the opinion of the physician, withholding the vaccine entails a greater risk. As with any vaccine, vaccination with TYPHIM VI<sup>®</sup> may not protect 100% of susceptible individuals.

Please see enclosed full Prescribing Information for TYPHIM VI<sup>®</sup>.  
 TYPHIM VI<sup>®</sup> is manufactured by Aventis Pasteur SA and distributed by Aventis Pasteur Inc.  
 Aventis Pasteur Inc.  
 Discovery Drive • Swilleyville, PA 18770  
[www.us.aventispasteur.com](http://www.us.aventispasteur.com)

For fast hemostasis  
**CROSSEAL. RIGHT AT THE MOMENT YOU NEED IT**



**INTRODUCING**



**CROSSEAL**  
fibrin sealant (human)  
The first all human,  
bovine-free  
fibrin sealant.

For BOND mixing, indications and usage including contraindications, see CONTRA product literature sheet.

# RECOMBINATE ADVATE


## BREAKTHROUGH TREATMENT FOR HEMOPHILIA A


### Safety

- Unlike other current commercially available factor VIII therapies, ADVATE rAHF-PFM is processed **without the addition of human or animal plasma proteins and albumin** in the cell culture process, purification or final formulation
- Eliminates the risk of unknown viruses and infectious prions carried in these protein additives
- Low incidence of inhibitor formation<sup>1</sup>

### Efficacy

- Good to excellent efficacy in 86% of bleeds<sup>2</sup>
- More than 8 out of 10 bleeding episodes required only one infusion<sup>2</sup>
- The pharmacokinetic properties of ADVATE rAHF-PFM are equivalent to RECOMBINATE rAHF<sup>3</sup>

  
ADVATE  
Antihemophilic Factor (Recombinant),  
Plasma/Albumin-Free Method  
*A whole new outlook.*



## Description of Problems

- Complete omission of risk from the body of the item
- False or misleading safety claims
  - ❑ Use of subjective terminology, e.g., “unsurpassed...safety”, without supportive data
- False or misleading comparative claims
  - ❑ False statements regarding a competing product
  - ❑ Claims that a competing product does not comply with recommended dosing/immunization schedules



## Description of Problems

- False or misleading effectiveness claims
  - ❑ Overstating the approved indication for use
  - ❑ Presentation of effectiveness data not supported by substantial evidence
  - ❑ Claims of long-term effectiveness based upon “estimated” data
  - ❑ Use of subjective terminology, e.g., “fast”, without supportive data





## Three DTC Guidances

- Three (3) new draft guidances released on 2/4/04 for public review and comment
- Comment period re-opened for an additional 90-days on 6/1/04



## APLB Priorities

- Continue 100% real-time review of surveillance submissions (FDA Form 2253/2567 submissions)
- Vigorous enforcement action
- Work interactively with industry
- APLB Contact Info
  - Phone: 301-827-3028; Fax: 301-827-3528

